

REMARKS

This is intended as a full and complete response to the Office Action dated April 5, 2006, having a shortened statutory period for response set to expire on July 5, 2006.

In the specification, the abstract has been amended to correct minor editorial problems.

After submission of this response, claims 1-29 remain pending in the application and are shown above. Claims 1-3, 6-19 and 22-28 are rejected and claims 4, 5, 20 and 21 are objected to. Reconsideration of the rejected claims is requested for reasons presented below.

Claims 7, 13, 15, 20, 21 and 23 are amended to correct matters of form. Claims 1, 3, 7, 16 and 23 are amended to clarify the invention. Claim 29 has been added to further clarify the invention.

Information Disclosure Statement

The Examiner has stated that the listing of references in the specification is not a proper information disclosure statement. Applicants respectfully traverse this objection.

The three references mentioned in the specification (US 5892860, 6877553 and 6932161) are not material to the patentability of the application, and thus, do not need to be disclosed in an information disclosure statement. Therefore, Applicants submit that there is no need to submit these references in an information disclosure statement.

Drawings

The drawings are objected to as failing to comply with 37 CFR 1.84(p)(5) because they include the following reference character(s) not mentioned in the description: 236. Applicants respectfully traverse this objection.

The reference 236 appears in Figures 2, 6b and 8 and is described in paragraph [0027] of the application as filed beginning with "Figure 2 shows a partial section

view...” The reference 236 can be found on line 6 of paragraph [0027] and reads, “A landing profile 236 located on the inner diameter of the landing tool 200 mates with a corresponding landing shoulder 366 of the stinger 300 to limit movement of the stinger 300 through the landing tool 200.”

Claim Rejections – 35 USC § 102

Claims 1-3, 6-11, 14-19, 22-26 and 28 stand rejected under 35 USC § 102(e) as being anticipated by *Patel et al.* (US 2003/0221829). Applicants respectfully traverse the rejection.

Claims 1, 7, 16 and 23 have been amended to further clarify that, in the claimed embodiments, a blocking member is displaced to permit connection between an upper and a lower instrumentation line. *Patel* does not teach, show, or suggest a blocking member as asserted by the Examiner. Rather, *Patel* simply suggests in paragraph [0102] line 6 that “a connection, such as a wet connect, is formed by moving a corresponding connecting feature 236 of dip tube 206 upwardly into engagement with upper connection feature 234 of side pocket sub 214.” Accordingly, Applicants submit that independent claims 1, 7, 16 and 23, as well as those claims that depend therefrom, are allowable and respectfully requests withdrawal of this rejection.

Claim Rejections Under 35 U.S.C. § 103

Claims 12, 13 and 27 are rejected under 35 USC § 103(a) as being unpatentable over *Patel et al.* Applicants respectfully traverse the rejection.


As described above, claims 7 and 23 (from which claims 12, 13 and 27 depend) have been amended to clarify that, in the claimed embodiments, a blocking member is displaced to permit connection between an upper and a lower instrumentation line. As mentioned above, *Patel* does not teach a blocking member. Accordingly, Applicants submit that claims 12, 13 and 27 are allowable and respectfully requests withdrawal of this rejection.

Conclusion

In conclusion, the references cited by the Examiner, alone or in combination, do not teach, show or suggest the invention as claimed.

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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